

### REMARKS

Claims 14-18, 20-30, and 32-40 were pending. Claims 1, 22, 25, 28 and 34 have been amended. No new matter has been added. The applicant respectfully requests reconsideration of the pending rejections in view of the above amendments and the following remarks.

#### **1. Claim Rejections Under Section 103**

Claims 14-18, 20-30 and 32,40 were rejected under 35 USC 103 (a) as allegedly being unpatentable over U.S. Patent No. 6,009,436, to Motoyama et al ("Motoyama") in view of UK Patent Application, GB 2 307 571 to Takasawa et al ("Takasawa"). The applicant respectfully disagrees.

Claim 14 recites a computer executable method of converting a format of a first source document to a format of a second source document. In the claimed method, patterns common to a first source document and a second source document are identified. The identified common patterns are used to map elements and sub-elements in the first source document to equivalent elements and sub-elements in the second source document. As amended, the claim specifies that a first element in the first source document is mapped to a second element in the second source document based on the identified common patterns, where the first element and the second element have different element names. Thus, the claim expressly requires a mapping between two differently-named elements in two source documents based on common patterns identified in the two documents. The applicant submits that at least this limitation is neither disclosed nor suggested in the cited art.

As explained in previous responses, Motoyama discloses a method for mapping a first structured information format to a second structured information format, in which a user interactively maps components in the first format to the second format by selecting components in the first format for mapping and selecting target components in the second format. *See, e.g.*, Abstract, Figs. 4, 5, 6A, 12B and 12C. The Examiner admits that Motoyama does not disclose identifying patterns that are common to two source documents, and the applicant submits that it

therefore necessarily cannot disclose or suggest mapping between differently named elements based on such identified patterns.

For this missing subject matter, the Examiner relies on Takasawa, pointing to Takasawa's disclosure of the use of a structure list for "totalizing" extracted logical structure information from sample documents. But while Takasawa may disclose parsing source documents and comparing elements and attributes in such documents to generate a "structure list" that is used in the creation of a DTD, nothing in Takasawa discloses or suggests performing such a comparison with elements that have different element names. Takasawa discloses that to generate a DTD from multiple sample documents, a "structure information extracting unit" sequentially reads character strings of a document and determines whether the string represents a start tag of an element. Takasawa, page 13, lines 2-9. As Takasawa explains, when the character string is a start tag, the unit reads an element name in the start tag and determines whether the element is a new element by comparing the element name to the structure list. Specifically, according to Takasawa, "structure information extracting unit 12 refers to the current structure list . . . , and decides that the element concerned is a new element when the element identification name concerned is not entered in the structure list and that the element concerned is not a new element when it is already entered in the list." Takasawa, page 13, lines 15-21. When the element is a new element, the new element – that is, an element identifier corresponding to the element name – is added to the structure list. Takasawa, page 13, line 23-page 14, line 4. Thus, Takasawa expressly identifies elements as being new or not based on element name, and nowhere suggests identifying differently-named elements as occupying the same location in the document structure.

The applicant therefore submits that Motoyama and Takasawa, alone or in combination, fail to disclose or suggest at least the limitation of mapping between two differently-named elements in two source documents based on common patterns identified in the two documents, which claim 14 expressly requires. Accordingly, claim 14, and dependent claims 15-18, 20-21, and 37, which are based directly or indirectly on claim 14, are allowable over the cited references.

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Claims 22, 25, 28 and 34 are independent claims directed to methods, computer program products, and systems that all include limitations analogous to the limitation discussed above in the context of claim 14. Accordingly, the applicant submits that these claims, and dependent claims 23-24, 26-27, 29-33 and 35-40 are allowable for at least the reasons discussed above in the context of claim 14.

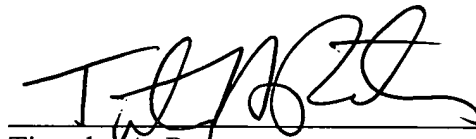
## 2. Conclusion

The applicant submits that all claims are now in condition for allowance, which action is respectfully requested. No fees are believed to be due at this time. Please apply any charges or credits to deposit account 06-1050.

Respectfully submitted,

Date: \_\_\_\_\_

12/2/03



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Timothy A. Porter  
Reg. No. 41,258

Fish & Richardson P.C.  
500 Arguello Street, Suite 500  
Redwood City, California 94063  
Telephone: (650) 839-5070  
Facsimile: (650) 839-5071